

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**HOFFMAN & HOFFMAN**

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Attorneys for Debtor(s)

In Re:

EUGENE FINNEGAN  
and SHARON FINNEGAN

Case No.: 23-11113 / CMG

Chapter 13

Hearing Date: 08/07/2024

**NOTICE OF MOTION TO APPROVE SALE OF REAL PROPERTY**

TO: Albert Russo, Trustee All Creditors on attached Matrix  
CN 4853  
Trenton, NJ 08650

PLEASE TAKE NOTICE that on Wednesday, August 7, 2024 at 9:00 a.m. the undersigned attorney for the debtor(s), Brian L. Hoffman, Esq. will apply to the United States Bankruptcy Court, 402 E State St Office Room 2020, Trenton, New Jersey for an Order:

1. Approving the sale of debtors' real property located at 16 Concord Drive, Hazlet, New Jersey 07730; and
2. Allowing debtors to pay the balance of their Chapter 13 plan from the gross proceeds of the sale of their real property;

3. Authorizing the debtors to pay their real estate attorney's fee as well as the commissions due to the debtors' real estate broker and the purchaser's broker from the gross proceeds of the sale of their real property;
4. For whatever relief the Court may deem necessary.

STATEMENT REGARDING BRIEF

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, the undersigned maintains that no brief is necessary because the issues involved are not complex or novel, Movant relies on clear statutory language as the basis for relief, and the moving papers give adequate notice of movant's theory of relief and relevant facts.

ORAL ARGUMENT

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(f), the movant shall only appear for oral argument if this Motion becomes contested, or if the Court otherwise directs.

LOCAL RULE 9013-1(a) & (d)

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(a) and (d), unless timely responsive papers are filed in accordance with the appropriate rules, this Motion shall be deemed uncontested.

Dated: July 10, 2024

/s/ Brian L. Hoffman  
Brian L. Hoffman, Esq.  
Attorneys for the Debtor(s)